

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

23-CR-99-JLS-JJM

v.

AFFIRMATION

SIMON GOGOLACK,

Defendant.

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and was assigned to represent the above-named defendant, Simon Gogolack.

2. On June 3, 2024, this Court held a status conference. At the conference, this Court learned that, despite having over ninety days to do so, the government has not produced the discovery it had been ordered to produce.

3. At the conclusion of that conference, the government moved to exclude time under the Speedy Trial Act, 18 U.S.C. §§ 3161-3174.

4. Two defendants voiced an objection to this exclusion, and this Court then ruled that it would not be proper to exclude time under the Act.

5. Mr. Gogolack files this affirmation, through his attorney, to make clear that he joins in the objection to the exclusion of time under the Act.

DATED: Buffalo, New York, June 3, 2024

Respectfully submitted,

/s/ Jeffrey T. Bagley

Jeffrey T. Bagley

Assistant Federal Public Defender

Federal Public Defender's Office

300 Pearl Street, Suite 200

Buffalo, New York 14202

(716) 551-3341, (716) 551-3346 (Fax)

jeffrey_bagley@fd.org

Counsel for Defendant

TO: Casey Chalbeck
Assistant United States Attorney